

Subject: In Today's Federal Register - Comment dates set for Hawk Relay  
Petition regarding Deaf Blind Relay Services

**FEDERAL COMMUNICATIONS COMMISSION**

[CG Docket No. 03-123; DA 07-4924]

Consumer & Governmental Affairs Bureau Seeks Comment on Petition for  
Clarification Concerning the Provision of Deaf Blind Relay Service (DBRS)

AGENCY: Federal Communications Commission.

ACTION: Notice.

SUMMARY: In this document, the Commission's Consumer & Governmental Affairs  
Bureau (Bureau) seeks comment on a petition for  
clarification filed by Hawk Relay (Hawk) concerning the provision of Deaf  
Blind Relay Service (DBRS Petition). Specifically, the Bureau seeks comment  
on whether DBRS falls within the definition of Telecommunications Relay  
Services (TRS) as set forth in section 225 of the Communications Act of  
1934.

DATES: Comments are due on or before February 4, 2008. Reply comments are  
due on or before February 19, 2008.

<http://a257.g.akamaitech.net/7/257/2422/01jan20081800/edocket.access.gpo.gov/2008/pdf/E7-25648.pdf>

**The DeafBlind Relay Service**

For the purpose of clarification for this comment, the terminology of the word DeafBlind  
also apply to individuals who are deaf or hard of hearing with severe vision loss and those  
who are low vision or blind with moderate to profound hearing loss.

In addressing the combining issues of visual and hearing issues, I fully agree that the  
DBRS concept or model of providing Communication Facilitators (CF) to individual who are  
DeafBlind does falls within the definition of Telecommunications Relay Services (TRS) as  
set forth in section 225 of the Communication Act of 1934.

For the most part TRS has already addressed the communication issues of the Deaf and  
Hard of Hearing communities. My comment is strictly focusing on the visual need of the  
DeafBlind community when using the TRS service.

**I. Communication Preference**

Due to the diversity of the DeafBlind community, there are about a half dozen  
communication methods or preference that the DeafBlind used. Some of the methods may  
include:

- a. American Sign Language (ASL), Pigeon Sign Language (PSE) or Signing Exact  
English (SEE)
- b. Speech
- c. Braille
- d. Print on Palm (POP)

I have also encounter quite a few individual who are DeafBlind whose language is primary in Spanish which required a CF who know Spanish in addition to the DeafBlind individual visual need.

For those with low vision, many cannot access the phone; relay service or VRS without support help from a friend or family members. Some of the issues may be:

- a. Poor or cannot see the visual display while using a TV, computer monitor or TDD
- b. Limited or non-existing tele-communication technology for low vision or Braille users
- c. No access to tele-communication for those who depends solely on POP

Back in the mid “80” to the early “90” there were a few assistive devices that simplify the DeafBlind access to telecommunication.

For the DeafBlind who read Braille, the tele-braille is the most favorite device in using the phone. Unfortunately this device is no longer being made for the last 12 years. However there is one other similar device still being manufacture. But I’ve heard many comments from users that this particular device barely or does not meet their communication needs.

For the low vision users, the external Large Visual Display (LVD) was the favorite device to view the messages on the TDD. That too is no longer being made. There are a few TDD machines, including the Voice Carry Over (VCO), that have a larger display but sadly many DeafBlind users cannot read it.

While technology with computers has made great advancement in the area of tele-communication, there are limited to those who have the technical know how to use it. For those who are technically challenged, the current computers and assistive equipment can be very complex which required a large amount of time and energy to train the DB person to use it, providing if it available in their area. Often for many individuals, they have to travel great distance to get the training, not to mention of getting or qualifying the needed funds (if exist) for room accommodation and meals expenses.

Without outside support in research and development, many companies specialize in assistive equipment, do not have the resources to develop new or improve devices for the DeafBlind community.

In addition to their visual and hearing issues, there are a good number of individual who are DeafBlind, cannot access the TRS service due to their additional disabilities and who cannot qualify or on a waiting list for Personal Care Attendant (PCA). Some of the disabilities may include those who:

- a. Have limited or no use of their hands that prevent them to type or sign
- b. Are mentally challenged and cannot communicate their thoughts in understandable phone or VRS conversation.
- c. cannot sign and have a speech impairment which cannot be understood by most people.

Whatever the challenges it may be, the CFs can fulfill most of Individual who are DeafBlind communication needs. If you have any question about my comment, I can be reach at [ranpope@comcast.net](mailto:ranpope@comcast.net).

Randall Pope who is DeafBlind